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June 10, 2022

Via Electronic Filing

The Honorable Judge Rachel P. Kovner
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

Re: *GBML LLC v. M2B Investors, Ltd.*
Case No.: 1:22-cv-03138

Dear Honorable Judge Rachel P. Kovner:

This law firm represents Defendant Wall Street Mortgage Banker d/b/a Power Express Mortgage (the “Defendant Wall Street”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules I.F and II.A, this letter respectfully serves to request an extension of Defendant Wall Street’s time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including July 11, 2022.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 7-8] and requires additional time to gather information from Defendant Wall Street to respond to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
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VIA ECF: All Counsel

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendant Wall Street to waive any defenses to personal jurisdiction due to improper service of process.